## **EXHIBIT P**

EXHIBIT 33
Witness: Ladd
Date: 10-15-2020
Stenographer: Victoria L. Valine, CSR No. 3036

This check covers all excess taxes from 2015 and 2016.

Also, when I bought back the BAC,
I over-bought by 770 shares,
so that is worth about 18,000,
and remains in the TD AmeriTrade
brokerage account.

Lastly, according to Steve's calculations, you will owe another 7,070 for 2018

Medicare premiums our what you & mon sormally pay. I will send a check for that at yearend - noted on my calendar.

PLAINTIFF'S EXHIBIT Ladd 33

## Robert Ladd

From:

Steve <stevenladd@comcast.net>

Sent:

Tuesday, April 4, 2017 8:30 AM

To:

Robert Ladd; Dan Waxler

Subject:

Re: Mom & Dad taxes

You're right - I used the price of BAC on 5/31/16 when I did my calculation for the 770 shares, and its gone up appreciably. So \$18042 is the amount that is needed to make up the difference for 2015/2016. I really encourage you to pay the \$7070 for the increase in 2018 medicare premiums now, so that we can "put this all behind us" (those are Dads words) and dont have to deal with it again. (Another transposition error - the medicare increase will be \$7070, not \$7707). So, would you send them a check for

\$18042 + \$7070 = \$25,112

I think that would really help.

On 4/3/2017 7:54 PM, Robert Ladd wrote:

Finally had a chance to review. First of all....thanks Steve for catching that error that I over-bought the BAC shares.

And that error actually benefits me by \$18,095, or 770 shares x \$23.50.

So here is my math:

Excess 2016 taxes owed (Federal and RI): \$219,044

Plus excess 205 taxes 3,787

Plus make-up for lost dividends 3,100

Minus cash set aside \$188,944

Minus excess stocks (MGT + BAC) 18,945

TOTAL OWED BY ROB now: \$18,042

Also: Rob owes an additional \$7,070 in January 2018 to cover Medicare premiums.

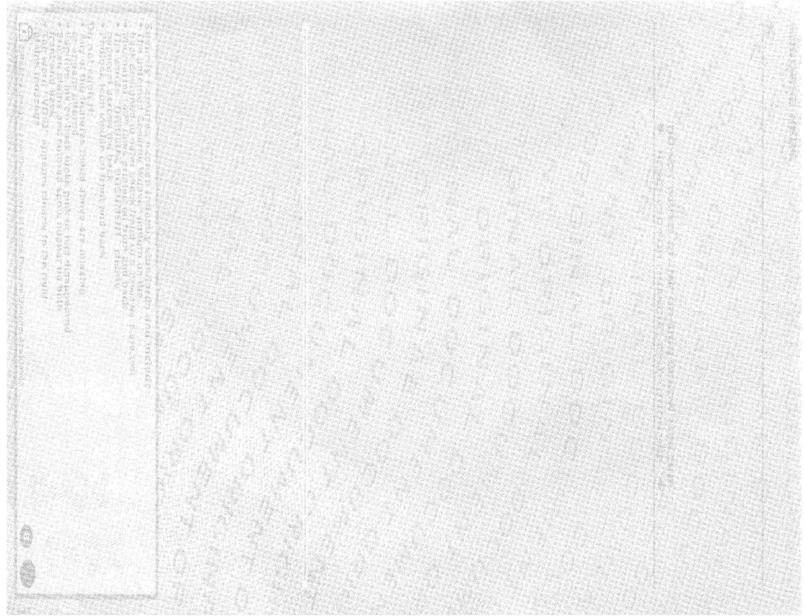
If we agree, I will mail Dad a check for \$18,042 tomorrow; that way it will have plenty of time to clear before he needs to draw on it.

Thanks, Rob

LADDCAP VALUE PARTNERS LP  335 MADISON AVE – SUITE 1100  NEW YORK, NY 10017		1330
	DATE	1-32/210 NY 94101
PAY TO THE SPRING OF STATE OF	eymour Ladd	\$ 18,042.00
n Eighteen th	ousand firty-tus and Will	DOLLARS Depart Belgies
Bank of America		
ACH R/T 021000322		A fadl

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